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March 7, 2024

VIA ECF

The Honorable Paul G. Gardephe
United States District Court
Southern District of New York
40 Foley Square
New York, NY 10007

Re: United State of America v. Emmanuel Perez, 23 Cr. 204 (PGG)

Your Honor:

We represent Emmanuel Perez in the above-captioned matter. We write to respectfully request a two week extension to file pretrial motions pursuant to the Court's order. The reason for the request is that the parties are actively engaged in ongoing discussions. Additionally, counsel just concluded a five week trial in *United States of America v. Jordan, et al.*, 20 Cr. 305 (LDH), and needs time to engage in further discussions with our client and the government. The government consents to this request.

Thank you for your time and consideration.

Respectfully submitted,

s/ Jacqueline E. Cistaro, Esq.
David K. Bertan, Esq.

cc: All Counsel

MEMO ENDORSED

The Application is granted.

SO ORDERED:



Paul G. Gardephe, U.S.D.J.

Dated: March 7, 2024